UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
C.D.S. INC.,	
Plaintiff,	
-against-	
BRADLEY ZETLER; CDS, LLC; RAPID SYSTEMS CC; and JOHN DOES 1-5.	Civil Action # 16 CV 3199
Defendants,	
-and-	
AMAZON WEB SERVICES, INC.; and RACKSPACE US, INC.	
Nominal Defendants.	

DECLARATION OF CHRISTOPHE RACLE IN FURTHER SUPPORT OF PLAINTIFF'S APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

CHRISTOPHE RACLE, pursuant to 28 U.S.C. § 1746, declares the following to be true and correct under the penalty of perjury:

1. I am the Chief Technology Officer / Client Support Manager of CDS SARL. I provide technology support to CDS, Inc. and I submit this declaration in further support of CDS, Inc.'s application for a temporary restraining order and preliminary injunction in the above captioned matter. The facts stated below are either within my own knowledge and true or they are based on information supplied to me and that information is true to the best of my information and belief.

2. I submit this declaration to address (1) the assertion in Mr. Dogramaci's letter that "Mr. Zetler through CDS LLC, registered the Internet domain name 'cdsglobal.com'" and (2) to call to the Court's attention that Mr. Zetler, not content to take the CDSGlobal website / domain name, has also taken over and claimed ownership over the domain names that CDS SARL host for its clients. It should go without saying that there is no reason for Mr. Zetler or CDS LLC to have done this.

CDS GLOBAL DOMAIN REGISTRATION

- 3. I performed an historical analysis of the domain name registration for CDSGlobal.com (the "Domain") and can state that Mr. Zetler's claims that he registered the Domain in the name of CDS LLC are false, as can be seen from my report, a true and accurate copy of which is attached hereto as Exhibit A.
- 4. The Domain was not first registered to CDS LLC but was instead registered to CDS, Inc.
- 5. The Domain was registered from 2004 until April 2015 under the name of CDS, lne. as owner some eleven years.
- 6. From May 2015 until September 2015, the ownership of the Domain under the Whois record was hidden under the Whois privacy protections. I assume that Mr. Zetler changed this since neither CDS, Inc. nor CDS SARL did this. Certainly, changing the Domain registration information was not something Mr. Zetler discussed with me.
- 7. Starting in December 2015, the Domain ownership was changed, again, to CDS LLC. This change was neither discussed with anyone in Paris, to the best of my knowledge, nor was it authorized. The Domain belongs to CDS, Inc. and Mr. Zetler had no right to change the name of the owner to CDS LLC.

8. Sometime, I am not certain when, between March and April 29, 2016, Mr. Zetler moved the Domain from one server to another server. I believe that this is what caused the Domain and the website to go out of service over the weekend of April 30 – May 1. He should not have moved this – he had no right to do so and he certainly had no permission. I am told that Mr. Zetler claims that the website went down due to an "attempted hack". To me, this is highly unbelievable in the absence of logs showing the attacks.

THE CDS CLIENT WEBSITES

- 9. CDS SARL and CDS, Inc. host websites for their modeling agency clients pursuant to web hosting agreements. These agreements are between the clients and either CDS, Inc. or CDS SARL but never between the clients and CDS LLC or Rapid Systems nor between the clients and Mr. Zetler personally.
- and CDS, Inc. listed as the technology contact and administrative support contact. If the website hosting agreement comes to an end, we then simply change the registration on Whois to reflect that the registrant is the client. And this makes sense since the client owns the website and their domain we do not, we just register for them.
- 11. As I was investigating the situation with the Domain, I happened to notice that the ownership listing for our clients' websites on the Whois records had been altered by Mr. Zetler.

 CDS, Inc. was no longer listed as the registrant of the clients' websites.
- 12. Instead, Bradley Zetler of CDS LLC was now listed as the "Registrant". Mr. Zetler and CDS LLC are now holding themselves out to the world as the registrants, or owners, of websites that belong to our clients and which were originally established and previously registered under the name of CDS, Inc.

Case 1:16-cv-03199-VM Document 20 Filed 05/05/16 Page 4 of 31

This is a serious issue. It represents, in my opinion, a risk to our relationships 13.

with our clients. They will certainly be upset when they are informed that the registration of

their property, that we administer under a web hosting agreement, has been changed to CDS

LLC, a stranger to them.

I attach, as Exhibit B, a true and accurate copy of my investigations regarding 14.

several of our clients. I have highlighted, in red, the changes on the Whois records. As can be

seen, just from the sampling that I conducted, the following clients have been changed: Profile-

Models.com; Nathalie-models.com; City-Models.com; Harry-Models.com; Synergymodels.com;

and, Joule-Studio.com.

As can be seen from this declaration, Mr. Zetler did not own the Domain and 15.

should never have changed the registration information for the Domain and Mr. Zetler did not

own our clients' websites but changed the registrations there also.

I declare under the penalty of perjury under the laws of the United States of America that

the foregoing is true and correct.

Dated: May 4, 2016

Paris, France

CHRISTOPHE RACLE

4

EXHIBIT A



[cDs Global] domain history

Christophe Racle to: JEDeutsch@nmmlaw.com Cc: Jerome Marechaux, Diane Treat, Jerome Viollon 05/04/2016 09:03 AM

History:

This message has been replied to.

Hi Jeremy,

I have analyzed the documents, maybe you already notice these points:

- Between 2004 until April 2015 the domain cdsglobal.com was registered under the company cDs Inc (page 23 and following pages)
- Between May 2015 until September 2015 the Whois record was hidden by privacy protection, so we don't see who is the owner of the domain during this period. (page 17 to 22)
- From December 2015, Who is record shows CDS LLC as domain owner. (page 7 to 16)
- To go back on the page 3, I noticed an error If I'm correct.

The date says "As of April 27, 2016 on top of the page, then on Registration details: Name servers is: Rackspace.com, where it should say "Amazon" as shown on Page 4 & 5 result of record. The IP address of the website should normally reflect the new IP.

It seems one record is missing, the Whois record sent on March 09, 2016 where it was still Rackspace as Name Server and Old Webserver IP.

Here are the record from March 09, the IP of the server changed between, March and April, so the website has been moved to new server. (but stay at Amazon) You can see the old IP address of the webserver and we can see this server was hosting 22 other websites. (52.16.135.217 - 22 other sites hosted on this server)

Email	dns@cdsglobal.com is associated with ~139 domains
	abuse-contact@publicdomainregistry.com is associated with
	~4,628,599 domains
D ! - !	CDS II C is seed to be dead of the control of the c

Registrant Org	CDS LLC is associated with ~93 other domains
Registrar	PDR LTD. D/B/A PUBLICDOMAINREGISTRY.COM
Registrar Status	clientTransferProhibited https://www.icann.org/epp#clientTransferProhibited
Dates	Created on 2004-09-17 - Expires on 2016-09-17 - Updated on 2015-08-05
Name Server(s)	NS.RACKSPACE.COM (has 248,832 domains) NS2.RACKSPACE.COM (has 248,832 domains)
IP Address	52.16.135.217 - 22 other sites hosted on this server
IP Location	Dublin City - Dublin - Amazon Technologies Inc.

ASN	AS16509 AMAZON-02 - Amazon.com, Inc. (registered May 04, 2000)
Domain Status	Registered And Active Website
Whois History	69 records have been archived since 2001-08-06
IP History	14 changes on 10 unique IP addresses over 12 years
Registrar History	
Hosting History	6 changes on 6 unique name servers over 13 years
Whois Server	whois.publicdomainregistry.com
Website	whois.publicdomaintegistry.com
Website Title	CDs Global: Booking Software, Websites For Talent & Model Management
Server Type	nginx
Response Code	200
SEO Score	90%
Terms	983 (Unique: 335, Linked: 416)
Images	35 (Alt tags missing: 7)
Links	183 (Internal: 116, Outbound: 9)
Registrar Regist Registrar: PDR I Registrar IANA I Domain Status: o https://icann.or Registry Registr Registrant Name: Registrant Organ Registrant Stree Registrant City:	clientTransferProhibited cg/epp#clientTransferProhibited cant ID: E Bradley Zetler cization: CDS LLC et: 39 Beards Creek Drive E Arapahoe E/Province: North Carolina cal Code: 28510 cry: US e: +1.6462333148 e Ext:
Admin City: Arap	D: Bley Zetler On: CDS LLC D Beards Creek Drive Dahoe Vince: North Carolina de: 28510 US 6462333148

Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC

Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.6462333148

Tech Phone Ext:

Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com

Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC: Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone:

+1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System:

http://wdprs.internic.net/

Here are the record given by Whois on May 02, 2016, New Name Server (Amazon now, instead of Rackspace, Update done on Apr/26/2016, new Webserver IP (54.171.210.193 is hosted on a dedicated server), and Dedicated server, no more other website hosted on the server (was 22 other site before).

We can see also that cDs LLC is associated to 106 other domains, 1 months ago it was 93, so we may suppose that some other domains have been moved to CDS LLC owner. (maybe this part is not relevant)

Whois & Quick Stats

Email	dns@cdsglobal.com is associated with ~152 domains
	abuse-contact@publicdomainregistry.com is associated with
	~4,630,421 domains

Registrant Org	CDS LLC is associated with ~106 other domains
Registrar	PDR LTD. D/B/A PUBLICDOMAINREGISTRY.COM
Registrar Status	clientTransferProhibited
Dates	Created on 2004-09-17 - Expires on 2016-09-17 - Updated on 2016-04-26
Name Server(s)	NS-1209.AWSDNS-23.ORG (has 179 domains) NS-1552.AWSDNS-02.CO.UK (has 137 domains) NS-346.AWSDNS-43.COM (has 4,924 domains) NS-584.AWSDNS-09.NET (has 6,601 domains)
IP Address	54.171.210.193 is hosted on a dedicated server

IP Location	Dublin - Dublin - Amazon Technologies Inc.
ASN	AS16509 AMAZON-02 - Amazon.com, Inc., US (registered May 04 2000)
Domain Status	Registered And Active Website
Whois History	74 records have been archived since 2001-08-06
IP History	15 changes on 11 unique IP addresses over 12 years
Registrar History	
Hosting History	7 changes on 7 unique name servers over 13 years
Whois Server	whois.publicdomainregistry.com
Website	wholst paoried of human egistry to m
	cDs Global: booking software, websites for talent & model management
Server Type	nginx
	200
SEO Score	90%
Terms	982 (Unique: 334, Linked: 416)
Images	35 (Alt tags missing: 7)
Links	183 (Internal: 116, Outbound: 9) updated on 2016-05-03)
Updated Date: 20 Creation Date: 20 Creation Date: 20 Creation Date: 20 Creation Date: 40 Creation Status: 40 Creation Status: 40 Creation Control Control Control Control Control Creation Contro	clientTransferProhibited rg/epp#clientTransferProhibited rant ID: : Bradley Zetler nization: CDS LLC et: 39 Beards Creek Drive : Arapahoe e/Province: North Carolina al Code: 28510 try: US e: +1.6462333148
Registrant Fax: Registrant Fax E	
Registrant Fax Registrant Email Registry Admin I Redmin Name: Brack Redmin Organizati Redmin Street: 39	l: dns@cdsglobal.com ID: dley Zetler ion: CDS LLC

Admin Postal Code: 28510

Admin Country: US

Admin Phone: +1.6462333148 Admin Phone Ext: Admin Fax: Admin Fax Ext: Admin Email: dns@cdsglobal.com Registry Tech ID: Tech Name: Bradley Zetler Tech Organization: CDS LLC Tech Street: 39 Beards Creek Drive Tech City: Arapahoe Tech State/Province: North Carolina Tech Postal Code: 28510 Tech Country: US Tech Phone: +1.6462333148 Tech Phone Ext: Tech Fax: Tech Fax Ext: Tech Email: dns@cdsglobal.com Name Server: ns-1209.awsdns-23.org Name Server: ns-1552.awsdns-02.co.uk Name Server: ns-346.awsdns-43.com Name Server: ns-584.awsdns-09.net DNSSEC: Unsigned Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com Registrar Abuse Contact Phone: +1-2013775952 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

Please let me know if you have question or if you need precision.

Please note my new email address

Please send your support request to pasupport@cds-official.com

Regards.

Christophe Racle

Client Support Manager

tel: +33 1 42 21 92 10 cell: +33 6 86 58 53 83

skype: c.racle

christophe.racle@cds-official.com



De: JEDeutsch@nmmlaw.com [mailto:JEDeutsch@nmmlaw.com]

Envoyé: mardi 3 mai 2016 16:07

A: Christophe Racle < cds-official.com

Objet: Fw:

Jeremy E. Deutsch

Norris McLaughlin & Marcus, P.A.

t: 917.369.8842 | f: 212.808.0844 | e: jedeutsch@nmmlaw.com | www.nmmlaw.com

NY Office: 875 Third Ave | 8th Floor | New York, NY 10022

Bridgewater, NJ | New York, NY | Allentown, PA

---- Forwarded by Jeremy E Deutsch/NMM on 05/03/2016 10:07 AM ----

From: Michael Blumel/NMM

To: Anastasios Nikolopoulos/NMM@NMM,

Cc: Jeremy E Deutsch/NMM@NMM

Date: 04/27/2016 05:41 PM

Subject: Re:

Michael Blumel | Director of Information Technology Norris McLaughlin & Marcus, P.A.

t: 908.252.4319 | f: 908.722.0755 | e: <u>mblumel@nmmlaw.com</u> | <u>www.nmmlaw.com</u> NJ Office: 721 Route 202-206 | Suite 200 | P.O. Box 5933 | Bridgewater, NJ 08807-5933 Bridgewater, NJ | New York, NY | Allentown, PA

From: Anastasios Nikolopoulos/NMM
To: Michael Blumel/NMM@NMM

Date: 04/27/2016 04:39 PM

Subject:

http://domainreport.domaintools.com/cdsglobal.com

client matter 121852-1 can u order the \$49 report asap

NOTICE: This e-mail is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you have received this communication in error, please do not distribute it and notify the sender immediately by e-mail or by telephone at 212-808-0700 and delete the original message. Thank You. http://www.nmmlaw.com

EXHIBIT B



[cDs SARL] Whois record history of few cDs SARL Customers.

Christophe Racle to: JEDeutsch@nmmlaw.com

05/04/2016 06:08 AM

Cc: Jerome Marechaux, Jerome Viollon Christelle Riot, "bagid@agidwagnon-avocats.com"

History:

This message has been replied to.

Hello Jeremy,

Please find below some history records of "Whois" for few clients of cDs SARL. We can see the following domains have been registered originally under cDs Inc, then cDs LLC took the ownership without any notification to us. I have highlighted in RED the details.

Result of request done on : http://www.domainhistory.net/ Profile-models.com Information (cDs SARL Customer)

We can see on the following report this domain was originally registered under cDs Inc. Domain records have been updated on January 21 th 2016.

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Server IP Address: 72.32.24.5 (0 total domains)

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: PROFILE-MODELS.COM

Registry Domain ID: 149006_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 2016-01-21T14:23:29Z Creation Date: 1997-02-18T05:00:00Z

Registrar Registration Expiration Date: 2017-02-19T05:00:00Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Bradley Zetler Registrant Organization: CDS LLC Registrant Street: 39 Beards Creek Drive

Registrant City: Arapahoe

Registrant State/Province: North Carolina

Registrant Postal Code: 28510 Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext: Registrant Fax:

Registrant Fax Ext: Registrant Email: dns@cdsglobal.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510

Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone: |

+1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-05-04T08:52:54Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time. By submitting this guery, you agree to abide by these terms.

Whois Lookup Date: 06-07-13

Registration Service Provided By: EXPERTSRS

Domain Name: PROFILE-MODELS.COM

Registration Date: 18-Feb-1997 Expiration Date: 19-Feb-2014

Status: ACTIVE

Name Servers: ns2.rackspace.com ns.rackspace.com

Registrant Contact Details: CDS INC

Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Administrative Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Technical Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Billing Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited. commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com. We reserve the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

Server IP Address at Lookup Time: 72.32.24.5

For the following domain, the owner is back to End client but we can see the Admin and tech contact has been switched from cDs INC to cDs LLC.

Last update done on May, 14th 2016. This agency doesn't exist anymore so there is no reason that domain record have been updated.

Nathalie-models.com Information (Old cDs SARL Customer, Agency closed)

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Server IP Address: 72.32.24.5 (0 total domains)

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: NATHALIE-MODELS.COM

Registry Domain ID: 1219231 DOMAIN COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 2016-04-14T12:57:39Z Creation Date: 1997-04-30T04:00:00Z

Registrar Registration Expiration Date: 2017-05-01T04:00:00Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Nathalie Cros-coitton Registrant Organization: Nathalie Cros-coitton

Registrant Street: 24 Rue Beaubourg

Registrant City: Paris

Registrant State/Province: Paris Registrant Postal Code: 75003

Registrant Country: FR

Registrant Phone: +33.680362746

Registrant Phone Ext: Registrant Fax: Registrant Fax Ext:

Registrant Email: nathalie@nathalie-models.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510

Admin Country: US Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC

Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC: Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone: +1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-05-04T09:11:31Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Whois Lookup Date: 05-30-13

Registration Service Provided By: EXPERTSRS

Domain Name: NATHALIE-MODELS.COM

Registration Date: 30-Apr-1997 Expiration Date: 01-May-2014

Status: ACTIVE

Name Servers: ns2.rackspace.com ns.rackspace.com

Registrant Contact Details:
Nathalie Cros-coitton
Nathalie Cros-coitton (nathalie@nathalie-models.com)
24 Rue Beaubourg
Paris
Paris,75003
FR
Tel. +33.680362746

Administrative Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Technical Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Billing Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or

by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com. We reserve the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

Server IP Address at Lookup Time: 72.32.24.5

City-models.com (cDs SARL Customer)

City-models.com Information

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Server IP Address: 72.32.24.5 (0 total domains)

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: CITY-MODELS.COM

Registry Domain ID: 1673540_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 2015-06-12T08:26:50Z Creation Date: 1998-07-29T05:00:13Z

Registrar Registration Expiration Date: 2016-07-28T04:00:00Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Bradley Zetler Registrant Organization: CDS LLC Registrant Street: 39 Beards Creek Drive

Registrant City: Arapahoe

Registrant State/Province: North Carolina

Registrant Postal Code: 28510 Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext: Registrant Fax: Registrant Fax Ext:

Registrant Email: dns@cdsglobal.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC

Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510 Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax:

Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone:

+1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-0S-04T09:31:00Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Whois Lookup Date: 04-10-13

Registration Service Provided By: EXPERTSRS

Domain Name: CITY-MODELS.COM

Registration Date: 29-Jul-1998 Expiration Date: 28-Jul-2013

Status: ACTIVE

Name Servers: ns2.rackspace.com ns.rackspace.com

Registrant Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Administrative Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Technical Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102

New York 1

New York, 10010

US

Tel. +1.2122067781

Billing Contact Details:

CDS INC

Bradley Zetler (dns@cdsglobal.com)

27 West 24th Street, Suite 1102 New York New York,10010 US

Tel. +1.2122067781

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Server IP Address at Lookup Time: 72.32.24.5

Harry-models.com (cDs SARL Customer)

Harrys-models.com Information

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Server IP Address: 72.32.24.5 (0 total domains)

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: HARRYS-MODELS.COM

Registry Domain ID: 6566812_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com Updated Date: 2015-04-17T20:03:00Z

Creation Date: 1999-05-17T22:04:45Z

Registrar Registration Expiration Date: 2016-05-17T21:05:21Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Bradley Zetler
Registrant Organization: CDS LLC
Registrant Street: 39 Bearing Creek Drive

Registrant Street: 39 Beards Creek Drive

Registrant City: Arapahoe

Registrant State/Province: North Carolina

Registrant Postal Code: 28510

Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext: Registrant Fax: Registrant Fax Ext:

Registrant Email: dns@cdsglobal.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC

Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510

Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC

Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510 Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone: +1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-05-04T09:34:22Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

Whois Lookup Date: 04-25-13

Registration Service Provided By: EXPERTSRS

Domain Name: HARRYS-MODELS.COM

Registration Date: 17-May-1999 Expiration Date: 17-May-2013

Status: ACTIVE

Name Servers: ns2.rackspace.com ns.rackspace.com Registrant Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Administrative Contact Details: CDS INC Bradiey Zetler (dns@cdsglobai.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Technical Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Billing Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Server IP Address at Lookup Time: 72.32.24.5

Synergymodels.Com Information (Agency in Hong Kong, cDs SARL Customer)

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: SYNERGYMODELS.COM

Registry Domain ID: 1548737297_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 2016-03-11T23:53:02Z Creation Date: 2009-03-23T09:13:01Z

Registrar Registration Expiration Date: 2017-03-23T09:13:01Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Bradley Zetler Registrant Organization: CDS LLC

Registrant Street: 39 Beards Creek Drive

Registrant City: Arapahoe

Registrant State/Province: North Carolina

Registrant Postal Code: 28510 Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext: Registrant Fax: Registrant Fax Ext:

Registrant Email: dns@cdsqlobal.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC

Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510

Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler
Tech Organization: CDS LLC
Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com

Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone: +1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-05-04T09:36:20Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited. commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com. We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Whois Lookup Date: 06-25-14

Domain Name: SYNERGYMODELS.COM

Registry Domain ID: 1548737297_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 18-Mar-2014 Creation Date: 23-Mar-2009

Registrar Registration Expiration Date: 23-Mar-2015 Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone:

+1-2013775952

Domain Status: OK

Registry Registrant ID: DI_1170488 Registrant Name: Bradley Zetler Registrant Organization: CDS INC

Registrant Street: 27 West 24th Street, Suite 1102

Registrant City: New York

Registrant State/Province: New York Registrant Postal Code: 10010

Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext:

Registrant Fax: Registrant Fax Ext:

Registrant Email: dns@cdsglobal.com

Registrant Email: dris@cosglobal.co Registry Admin ID: DI_1170488 Admin Name: Bradley Zetler Admin Organization: CDS INC

Admin Street: 27 West 24th Street, Suite 1102

Admin City: New York

Admin State/Province: New York Admin Postal Code: 10010

Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com Registry Tech ID: DI_1170488 Tech Name: Bradley Zetler Tech Organization: CDS INC

Tech Street: 27 West 24th Street, Suite 1102

Tech City: New York

Tech State/Province: New York Tech Postal Code: 10010

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext: Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

URL of the ICANN WHOIS Data Problem Reporting System:

http://wdprs.internic.net/

>>>Last update of WHOIS database: 2014-06-25T14:32:37+0000Z<<<

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time.

By submitting this query, you agree to abide by these terms.

Joule-studio.com Information (Casting Director based in Paris , cDs SARL Customer)

Most Recent Contact Email: dns(at)cdsglobal.com | Download Reverse Whois Report

Most Recent Contact Phone: +1.2122067781

Most Recent Server IP Address: 72.32.24.5 (0 total domains)

Most Recent Registrar: Pdr Ltd. D/b/a Publicdomainregistry.com | Download Reverse Registrar Report

Whois Lookup Date: 05-04-16

Domain Name: JOULE-STUDIO.COM

Registry Domain ID: 1740286_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com

Registrar URL: www.publicdomainregistry.com

Updated Date: 2015-07-01T07:32:46Z Creation Date: 1998-08-10T05:00:00Z

Registrar Registration Expiration Date: 2016-08-09T04:00:00Z

Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com

Registrar IANA ID: 303

Domain Status: OK https://icann.org/epp#OK

Registry Registrant ID:

Registrant Name: Bradley Zetler Registrant Organization: CDS LLC

Registrant Street: 39 Beards Creek Drive

Registrant City: Arapahoe

Registrant State/Province: North Carolina

Registrant Postal Code: 28510 Registrant Country: US

Registrant Phone: +1.2122067781

Registrant Phone Ext: Registrant Fax: Registrant Fax Ext:

Registrant Email: dns@cdsglobal.com

Registry Admin ID:

Admin Name: Bradley Zetler Admin Organization: CDS LLC

Admin Street: 39 Beards Creek Drive

Admin City: Arapahoe

Admin State/Province: North Carolina

Admin Postal Code: 28510

Admin Country: US

Admin Phone: +1.2122067781

Admin Phone Ext: Admin Fax: Admin Fax Ext:

Admin Email: dns@cdsglobal.com

Registry Tech ID:

Tech Name: Bradley Zetler Tech Organization: CDS LLC Tech Street: 39 Beards Creek Drive

Tech City: Arapahoe

Tech State/Province: North Carolina

Tech Postal Code: 28510

Tech Country: US

Tech Phone: +1.2122067781

Tech Phone Ext:

Tech Fax: Tech Fax Ext:

Tech Email: dns@cdsglobal.com Name Server: ns2.rackspace.com Name Server: ns.rackspace.com

DNSSEC:Unsigned

Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com

Registrar Abuse Contact Phone: +1-2013775952

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2016-05-04T09:50:41Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Registration Service Provided By: EXPERTSRS

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

Whois Lookup Date: 05-14-13

Registration Service Provided By: EXPERTSRS

Domain Name: JOULE-STUDIO.COM

Registration Date: 10-Aug-1998 Expiration Date: 09-Aug-2013

Status: ACTIVE

Name Servers: ns2.rackspace.com ns.rackspace.com

Registrant Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Administrative Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US Tel. +1.2122067781

Technical Contact Details: CDS INC Bradley Zetler (dns@cdsglobal.com) 27 West 24th Street, Suite 1102 New York New York,10010 US

Billing Contact Details: CDS INC

Tel. +1.2122067781

Bradley Zetler (dns@cdsglobal.com)
27 West 24th Street, Suite 1102
New York
New York,10010
US
Tel. +1.2122067781

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

(1) enable high volume, automated, electronic processes that stress or load this whois database system providing you this information; or

(2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.

We reserve the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

Server IP Address at Lookup Time: 72.32.24.5

Please note my new email address

Please send your support request to pasupport@cds-official.com

Regards.

Christophe Racle

Case 1:16-cv-03199-VM Document 20 Filed 05/05/16 Page 31 of 31

Client Support Manager

tel: +33 1 42 21 92 10 cell: +33 6 86 58 53 83

skype: c.racle

christophe.racle@cds-official.com

